



# ICO consultation on the draft updated data sharing code of practice

Q1 Does the updated code adequately explain and advise on the new aspects of data protection legislation which are relevant to data sharing?

☐

Yes

☒

No

Q2 If not, please specify where improvements could be made.

I don't feel that the document works as a stand-alone document - instead it seems like more of an addendum to explain GDPR and DPA 2018 more fully. I am relatively new to Data Protection and used the previous Code of Practice to learn from and refer to. I found the old version struck a great balance between being informative and technical, whilst also being accessible. I feel that someone new to Data Protection who was picking up this document would not have a thorough grasp of data sharing.

Q3 Does the draft code cover the right issues about data sharing?



Yes



No

Q4 If no, what other issues would you like to be covered in it?

But there could be more examples and much of what was in the old version (but that is still applicable) does not seem to have carried over. I guess that the concern was making the document unmanageable but I feel that the product has come out as rather disjointed and awkward.

Q5 Does the draft code contain the right level of detail?

☐ Yes

☒ No

Q6 If no, in what areas should there be more detail within the draft code?

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Q7 Has the draft code sufficiently addressed new areas or developments in data protection that are having an impact on your organisation's data sharing practices?

☐ Yes

☒ No

Q8 If no, please specify what areas are not being addressed, or not being addressed in enough detail.

GDPR to Part 3 and vice-versa is a really tricky and complex area. I feel that this could warrant it's own code as the nuances are very tricky and it can be very time and resource intensive trying to figure out what legislation you are processing under at various stages - particularly where we (Police) are partnership sharing with those who are competent authorities and those who are not. I find myself working between the NPCC manual (unfinalised), the legislation and the old code to try and figure things out but it is far from simple. More detailed guidance in this area would be appreciated by myself and my colleagues.

Q9 Does the draft code provide enough clarity on good practice in data sharing?

☐ Yes

☒ No

Q10 If no, please indicate the section(s) of the draft code which could be improved, and what can be done to make the section(s) clearer.

I can see that the code is trying to address the fear of sharing and that this is a difficult balance to strike whilst also trying to make clear the legislation.

Q11 Does the draft code strike the right balance between recognising the benefits of sharing data and the need to protect it?

☐ Yes

☒ No

Q12 If no, in what way does the draft code fail to strike this balance?

See above

Q13 Does the draft code cover case studies or data sharing scenarios relevant to your organisation?

☐ Yes

☒ No

Q14 Please provide any further comments or suggestions you may have about the draft code.

I would appreciate more examples around Part 3 into GDPR and vice-versa processing.

Q15 To what extent do you agree that the draft code is clear and easy to understand?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☒ Disagree
- ☐ Strongly disagree



Q16 Are you answering as:

- ☐ An individual acting in a private capacity (e.g. someone providing their views as a member of the public or the public)
- ☒ An individual acting in a professional capacity
- ☐ On behalf of an organisation
- ☐ Other

Q17 Please specify

Police Staff - Information Sharing Advisor

Q18 Please specify

Q19 Please specify

Thank you for taking the time to share your views and experience.